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**Pro hac vice* motion forthcoming

**NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.**

Sherrilyn Ifill
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Coty Montag*
1444 I Street NW, 10th Floor
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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CARNELLA TIMES and ERVING SMITH,	:	
on behalf of themselves and all others	:	
similarly situated, and	:	
THE FORTUNE SOCIETY, INC.,	:	CIVIL ACTION NO.
	:	
Plaintiffs,	:	
	:	
-against-	:	
	:	
TARGET CORPORATION,	:	
	:	
Defendant.	:	
	:	

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT, CONDITIONAL CERTIFICATION OF
SETTLEMENT CLASS, APPOINTMENT OF CLASS COUNSEL, AND
APPROVAL OF PLAINTIFFS' PROPOSED NOTICE OF SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement, Conditional Certification of Settlement Class, Appointment of Class Counsel, and Approval of Plaintiffs' Proposed Notice of Settlement and in the Declaration of Ossai Miazad in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement, Conditional Certification of Settlement Class, Appointment of Class Counsel, and Approval of Plaintiffs' Proposed Notice of Settlement

(“Miazad Decl.”), and the supporting exhibits thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) granting preliminary approval of the Settlement Agreement, attached as **Exhibit A** to the Miazad Decl.;
- (2) conditionally certifying the proposed Settlement Class pursuant to Fed. R. Civ. P. 23(a) and 23(b)(3);
- (3) appointing Plaintiffs’ Counsel as Class Counsel; and
- (4) approving the proposed Notice of Class Action Settlement and Claim Form, attached as **Exhibit B** to the Miazad Decl.

* * *

Plaintiffs submit a Proposed Order, attached to the Miazad Decl. as **Exhibit C**, for the Court’s convenience.

Dated: April 5, 2018
New York, New York

Respectfully submitted,

By: /s/ Ossai Miazad

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***Attorneys for Plaintiffs and the Putative
Settlement Class***